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May 9, 2025

VIA ECF

Honorable Harvey Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corp., et al. v. Equimine, Inc.* (No. 24-cv-4261)
and other cases listed in footnote 1 below
Answers to Interrogatories related to Jurisdictional Discovery**

Dear Judge Bartle:

This firm represents defendant Equimine, Inc., one of fifteen defendants in these Daniel's Law cases that, on March 18, 2025, moved to dismiss under Rule 12(b)(2) for lack of personal jurisdiction (the "Jurisdictional Moving Defendants").¹ I write on behalf of the Jurisdictional Moving Defendants regarding Your Honor's Order dated May 1, 2025, that directed them to file their answers to the interrogatories that Plaintiffs propounded as part of jurisdictional discovery (the "Interrogatories"). These answers are due to be served on May 14, 2025.

The Interrogatories seek information that at least some Jurisdictional Moving Defendants deem to be confidential. Accordingly, some answers to the Interrogatories likely will be designated Confidential, pursuant to a Discovery Confidentiality Order that we anticipate presenting to the Court in advance of May 14. In the interest of efficiency and to obviate the need to prepare and file motions to seal those answers to the Interrogatories, the Jurisdictional Moving Defendants respectfully submit that a practical and equally effective alternative to filing these answers on the docket would be to provide them by way of a courtesy copy to Your Honor's chambers. We have consulted Plaintiffs' counsel about this request and Plaintiffs do not object to the Jurisdictional Moving Defendants' proposal but defer to the Court as to whether the answers to Interrogatories should be filed on the docket or submitted in an alternative form.

¹ Twelve of the fifteen defendants joined the consolidated motion to dismiss under Rule 12(b)(2): GoHunt, LLC (No. 24-4380), Delvepoint, LLC (No. 24-4096), Equimine, Inc. (No. 24-4261), Melissa Data Corp. (No. 24-4292), Nuwber, Inc. (No. 24-4609), Belles Camp Communications (No. 24-4949), Spy Dialer, Inc. (No. 24-11023), Lighthouse List Company, LLC (No. 24-11443), Quantarium Alliance, LLC and Quantarium Group, LLC (No. 24-4098), PeopleWhiz, Inc. (No. 25-0237), and eMerges.com Inc. (No. 24-4434), which has since withdrawn from the motion. Three other defendants, We Inform, LLC (No. 24-4037), Infomatics, LLC (No. 24-4041), and The People Searchers, LLC (No. 24-4045), filed a separate motion to dismiss on personal jurisdiction grounds. A sixteenth defendant, Greenflight Venture Corp. (No. 25-1517), was granted leave to join the consolidated motion to dismiss on March 25, 2025.

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If this proposal meets with Your Honor's approval, please kindly endorse this letter and return it to the parties via the ECF system. Alternatively, if there are overriding reasons to file the answers to Interrogatories on the case dockets, the Jurisdictional Moving Defendants respectfully request permission, consistent with Local Rule 5.3(c)(2)(ii), to file their motions to seal by May 28, 2025, or fourteen (14) days after the answers are filed. We seek this clarification because Local Rule 5.3(c)(2)(ii) refers specifically to motions, pleadings, letters to the Court, and transcripts, but it does not expressly extend to discovery responses, which are not typically filed in the first instance.

We appreciate Your Honor's kind consideration of this request.

Respectfully submitted,

s/ Kevin R. Reich

Kevin R. Reich

cc: Counsel of record